

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION**

HEWLETT-PACKARD COMPANY, and
HEWLETT-PACKARD
DEVELOPMENT COMPANY, L.P.,

Plaintiffs,

v.

ICL NETWORK SOLUTIONS (HK),
LIMITED, and C2C TECHNOLOGY,
INCORPORATED,

Defendants.

Civil Action No. 05-40153 FDS

**AFFIDAVIT OF JIN H. KIM RE STATUS OF CASE AND REQUEST
EXTENDING TIME TO SEEK DEFAULT JUDGMENT**

I, JIN H. KIM, hereby depose and state as follows:

1. I am a member of the Bar of the State of California and an attorney with the firm of Howard Rice Nemerovski Candy Falk & Rabkin, a Professional Corporation, counsel for Plaintiff Hewlett-Packard Company and Hewlett-Packard Development Company, L.P. (collectively, "Plaintiffs"). I make this statement to apprise the Court of the status of the case and to show good cause to extend the time for seeking default judgment.

2. On June 2, 2006, this Court entered default against Defendant ICL Network Solutions (HK) LTD ("Defendant" or "ICLNS") for failure to defend as provided by Rule 55(a) of the Federal Rules of Civil Procedure. On the same day, the Court issued its Standard Order Regarding Motions for Default Judgment ("Order") which provides, among other things, that Plaintiffs must seek "necessary and appropriate action" with respect to the Order within 30 days of the Order.

3. Since the entry of default, Plaintiffs and Defendant have renewed negotiation efforts in order to settle this action. Although the parties have made considerable progress, the finalization and documentation of settlement cannot be accomplished within the time frame in which Plaintiffs must seek default judgment as set out in the Order. Accordingly, Plaintiffs request, pursuant to Paragraph 4 of the Order, that the Court extend the time in which Plaintiffs must seek default judgment to and including July 21, 2006. Such an extension will provide the parties sufficient time to settle the action, or, in the event settlement cannot be quickly reached, sufficient time for Plaintiffs to seek default judgment or other appropriate and necessary action.

Signed under the pains and penalties of perjury this the 29th day of June, 2006.

/s/ Jin H. Kim
JIN H. KIM

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

HEWLETT-PACKARD COMPANY, and
HEWLETT-PACKARD
DEVELOPMENT COMPANY, L.P.,

Plaintiffs,

v.

ICL NETWORK SOLUTIONS (HK),
LIMITED, and C2C TECHNOLOGY,
INCORPORATED,

Defendants.

Civil Action No. 05-40153 FDS

[PROPOSED] ORDER EXTENDING TIME FOR SEEKING DEFAULT JUDGMENT

Upon the affidavit of Jin H. Kim, counsel for Plaintiffs Hewlett-Packard Company and Hewlett-Packard Development Company, LP (collectively, "Plaintiffs"), and the record in this case, and with good cause appearing, it is hereby:

ORDERED that the time during which Plaintiffs must take seek default judgment as set forth in this Court's Standing Order Regarding Motions for Default Judgment (dated June 2, 2006) is extended to and until July 21, 2006.

IT IS SO ORDERED.

Dated: _____, 2006

UNITED STATES DISTRICT JUDGE